

Mon Apr 30 15:55:49 EDT 2018
CMS.OEX@epamail.epa.gov
FW: Comment period extension request for proposed rule Strengthening Transparency in Regulatory Science (Docket ID No. EPA-HQ-OA-2018-0259)
To: "cms.oex@domino.epamail.epa.gov" <cms.oex@domino.epamail.epa.gov>

From: Hope, Brian
Sent: Monday, April 30, 2018 7:55:47 PM (UTC+00:00) Monrovia, Reykjavik
To: CMS.OEX
Subject: FW: Comment period extension request for proposed rule Strengthening Transparency in Regulatory Science (Docket ID No. EPA-HQ-OA-2018-0259)

From: Jyotsna Pandey [mailto:jpandey@aibs.org]
Sent: Monday, April 30, 2018 2:28 PM
To: Pruitt, Scott <Pruitt.Scott@epa.gov>
Subject: Re: Comment period extension request for proposed rule Strengthening Transparency in Regulatory Science (Docket ID No. EPA-HQ-OA-2018-0259)

April 30, 2018

The Honorable Scott Pruitt

Administrator

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Dear Administrator Pruitt:

I write to respectfully request that the Environmental Protection Agency (EPA) extend by 60-days the deadline for receiving comments on the proposed rule, “Strengthening Transparency in Regulatory Science”, which was published in the Federal Register on April 30, 2018.

The American Institute of Biological Sciences (AIBS) is concerned that the current 30-day comment period does not allow sufficient time for the scientific community to fully analyze the proposed rule. It is thus not possible to submit detailed and substantive comments on a complex proposal that has such far-reaching and long-lasting impacts on public and environmental health.

We are concerned by the agency’s proposal to stop the use of scientific studies that have underlying data that are not publicly available. Many studies that inform regulations rely on scientific data that cannot be made public for reasons such as patient privacy or industry confidentiality but are still important to consider when crafting rules. The data transparency requirement is also likely to impose a significant new cost on the taxpayer as new systems will be required to manage, store, present, and track down data, as well as redact sensitive personal information. This proposed rule change is likely to negatively impact the efficiency of the rulemaking process and result in increased costs to the taxpayer.

Please extend by 60 days the deadline for comments to allow for a more thorough and thoughtful rulemaking process.

Sincerely,

Robert Gropp, Ph.D.

Co-Executive Director

Jyotsna Pandey, Ph.D.
Public Policy Manager
American Institute of Biological Sciences
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Suite 420
Washington, DC 20005
Phone: 202-628-1500 x 225
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April 30, 2018

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Comment period extension request for proposed rule *Strengthening Transparency in Regulatory Science* (Docket ID No. EPA-HQ-OA-2018-0259)

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We are concerned by the agency's proposal to stop the use of scientific studies that have underlying data that are not publicly available. Many studies that inform regulations rely on scientific data that cannot be made public for reasons such as patient privacy or industry confidentiality but are still important to consider when crafting rules. The data transparency requirement is also likely to impose a significant new cost on the taxpayer as new systems will be required to manage, store, present, and track down data, as well as redact sensitive personal information. This proposed rule change is likely to negatively impact the efficiency of the rulemaking process and result in increased costs to the taxpayer.

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Sincerely,

A handwritten signature in cursive script, appearing to read "Robert Gropp".

Robert Gropp, Ph.D.
Co-Executive Director